

ADAMS & COMMISSIONG LLP

ATTORNEYS AT LAW

65 BROADWAY SUITE 715  
NEW YORK, NY 10006  
TEL: 212-430-6590  
FAX: 212-981-3305

MARTIN E. ADAMS  
KARLOFF C. COMMISSIONG  
ADMITTED TO PRACTICE IN NEW YORK  
WWW.AMCMLAW.COM

July 31, 2020

VIA E.C.F.

Hon. Paul A. Engelmayer  
United States District Court Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Christopher Simon, 18 Cr. 390 (PAE) – 2-week extension of time to file submission

Dear Judge Engelmayer:

I write to request a 2-week extension of time to file a submission in this matter. This is the fourth request for an extension of time. As the Court is aware, the medical unit at FCI Fort Dix submitted a request for Reduction in Sentence (RIS) on Christopher Simon's behalf, to the warden of the facility. However, the decision in connection with an RIS has not been made because Mr. Simon had no appropriate release plan. In consultation with a social worker from the Federal Defenders, I have detailed a release plan in a letter dated July 31, 2020 and submitted it to the RIS Coordinator and Senior Counsel Advisor at FCI Fort Dix for their review. I will continue to update the Court regarding this process.

Accordingly, I request a 2-week extension of time to file a submission in this matter, pending a decision by the warden of FCI Fort Dix regarding the request for Reduction in Sentence.

Respectfully Submitted,



Karloff C. Commissiong, Esq.

Granted. Defense counsel's submission is due August 14, 2020, and the Government's reply, if any, is due August 18, 2020.

SO ORDERED.



PAUL A. ENGELMAYER  
United States District Judge

cc: A.U.S.A. Robert Sobelman (Via Electronic Mail)

August 3, 2020